

Cadwalader, Wickersham & Taft

US EPA RECORDS CENTER REGION 5



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May 17, 1988

VIA FEDERAL EXPRESS

Ms. Susan Swales
United States Environmental Protection
Agency, 5HE-12
Waste Management Division
CERCLA Enforcement Section
230 Dearborn Street
Chicago, Illinois 60604

Re: Ninth Avenue Dump, Gary, Indiana
U.S. Scrap Site, Chicago, Illinois
American National Can Company (American Can Company)
Response to Request for Information

Dear Ms. Swales:

This letter is submitted on behalf of our client, American National Can Company, in response to the letter dated March 9, 1988, of the United States Environmental Protection Agency ("EPA") in connection with the above-referenced sites ("Sites"). Although captioned "General Notice Letter and Information Request," the March 9 letter asserted claims of potential liability with respect to the Sites, but did not include any request for information relative to these Sites.

The March 9 letter was addressed to American Can Company and, according to Mr. Edward Kowalski, EPA Office of Regional Counsel, EPA did not request any information in its letter because American Can Company had previously submitted a response to an information request in regard to the Ninth Avenue Site. The March 9 letter, however, also referenced the U.S.

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Scrap Site, for which American Can Company had never been requested to provide information. Moreover, in its letter of the same date to other potentially responsible parties at these Sites, EPA sought information also in regard to several other entities. We do not believe that EPA has requested, at any time, information from American Can Company with respect to these other entities. Nevertheless, in a spirit of cooperation, we are submitting this response on behalf of American National Can Company and American Can Company, although no formal request for information was made.

Before discussing the request for information, we believe it is necessary to explain the relationship between American National Can Company and American Can Company, the addressee of EPA's March 9 letter. In November, 1986, American Can Company sold its packaging division, which subsequently merged into National Can Corporation on April 30, 1987. The successor company is known as American National Can Company ("American National"). Accordingly, this shall serve as the response to the March 9 letter addressed to American Can Company.

The delay in responding to this recent request for information was occasioned principally by the failure to receive such request directly from EPA. Additional delay was caused by the fact that many of the records relating to facilities now owned by American National continue to be in the possession of American Can Company, which is now known as Primerica Corporation. Further, the manual search of computer and microfiche records and the retrieval of relevant records from storage took longer than anticipated.

The following response is based upon the present knowledge, information, and belief of American National as derived from the knowledge and information of present employees gained in their capacity as such, and from a diligent search of available records (including computer and microfiche records and records in storage) of American National and Primerica Corporation that would likely contain the information sought by EPA. In replying to the request for information on behalf of itself and Primerica Corporation, American National has not, and shall not be deemed to have admitted any liability or responsibility with respect to the Ninth Avenue Dump, the U.S. Scrap Site, any other entities listed in the information request, the subject matter of such information request, or any other matter pertaining thereto. In fact, American National expressly denies any such liability and responsibility. Additionally, American National expressly reserves the right to modify, supplement, or amend its responses should additional or different information be found concerning the subject matter of the request for information.

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Notwithstanding this response or a modification, supplement, or amendment hereto, American National expressly reserves any and all defenses as may exist at law or in equity.

Subject to the foregoing, American National responds as follows:

Request No. 1:

Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Sites or to the Sites, or who may have arranged for disposal through any of the following persons or organizations: 1) Steve Martell, 2) U.S. Scrap Corp., 3) Liquid Engineering, 4) U.S. Drum Corp., 5) U.S. Drum Disposal, 6) David Head. In addition identify the following:

- a. The persons with whom you or such other person made such arrangements;
- b. Every date on which such arrangements took place;
- c. For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance;
- d. The owner of the waste materials or hazardous substances so accepted or transported;
- e. The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- f. All tests, analyses, and analytical results concerning the waste materials;
- g. The person(s) who selected the Sites as the place to which the waste materials or hazardous substances were to be transported;

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- h. The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- i. Where the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- j. Whether the waste materials or hazardous substances involved in each transaction were transhipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- k. What was actually done to the waste materials or hazardous substances once they were brought to the Sites;
- l. The final disposition of each of the waste materials or hazardous substances involved in such transactions.

Response to Request No. 1:

American National possesses no documents, and has no information, that indicate that hazardous substances, pollutants or contaminants were disposed of, treated, or transported to, at, by, or through the Ninth Avenue Site, the U.S. Scrap Site, U.S. Scrap Corporation, Liquid Engineering, U.S. Drum Disposal, U.S. Drum Corporation, Steve Martell or David Head.

We understand that, in accordance with the record retention policies of Primerica Corporation, no documents exist for the years prior to 1974; for 1974 through 1976, only microfiche information is available. Microfiche data that may concern transactions with some of the entities identified in the information request has been found and is attached hereto as Exhibit A. To aid your review, we have prepared a list summarizing the information contained in the microfiche data.

The microfiche data reflects payments by American Can Company to U.S. Scrap Corporation, Liquid Engineering, and U.S. Drum Disposal Corporation during the period from 1974 to 1978. There are, however, no documents in support or explanation of any payments prior to 1977. In regard to payments to U.S. Drum

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Disposal Corporation in 1977 and 1978, a search of available records was conducted but no records in support or explanation of these payments could be found.

Request No. 2:

Provide copies of all shipping documents, or other business documents including receipts relating to the transportation, storage and/or disposal of waste material at the above referenced Sites or with the following businesses and persons:

U.S. Scrap Corp.
Liquid Engineering
U.S. Drum Corp.
U.S. Drum Disposal
Steve Martell
David Head.

Response to Request No. 2:

American National is producing herewith microfiche data that may concern transactions with some of the entities identified in the request. The available information, however, in no way indicates that hazardous substances, pollutants, or contaminants were disposed of, treated, or transported to, at, by, or through any of the entities listed in such request.

Request No. 3:

Provide a list and description of all liability insurance coverage that is or was carried by you, including any self-insurance provisions that related to hazardous substances and/or the Sites identified above:

The relevant time period for this information is 1965 to 1977, inclusive.

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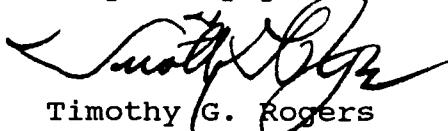
Response to Request No. 3:

American National is of the opinion that EPA's Request, concerning liability insurance coverage that it currently carries or formerly carried, is inappropriate because such information is not relevant to the subject matter of the Request and is not reasonably calculated to lead to the discovery of admissible evidence. On these grounds, American National declines to provide any information concerning liability insurance coverage. If, however, you have authorities that, you believe, support the view that EPA may require the submission of information concerning liability insurance coverage, we would be happy to review these authorities and would appreciate a copy of them.

To the extent the request seeks information pursuant to section 104(e)(2)(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499 (1986), concerning the ability of American National to pay for or perform the cleanup, we herewith submit as Exhibit B relevant pages from a registration statement filed in June, 1987, by American National with the United States Securities and Exchange Commission.

If, following your review of this response, you have any questions, please do not hesitate to call me.

Very truly yours,



Timothy G. Rogers

TGR:ks

Exhibit A

**PRIMERICA CORPORATION (AMERICAN CAN COMPANY)
MICROFICHE DATA PERTAINING TO U.S. SCRAP CORPORATION, FOR
WHICH SUPPORTING RECORDS ARE NO LONGER AVAILABLE (1974)**

<u>INVOICE ENTRY WORKSHEET</u> <u>(Form C-7)</u>	<u>No./Date</u>	<u>Invoice #</u>	<u>Amount</u>
12229	1/10/74	06526	123.25
5172	5/31/74	07419	212.50
6067	6/25/74	07629	170.00
9170	10/10/74	08452	153.00

12/31/74

123.25

8

AQ6275

04 001689

015

ACCOUNTS PAYABLE

MONTHLY CHECK DETAIL REPORT

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VENDOR #	PLT	C-7 INU/REF	GROSS AMOUNT	DISCOUNT	NET AMOUNT	VOUCHER #	L TYPE	CHK CHECK	NOTE
32006301	064	5122 07412	212.50	.00	212.50			4.1	
			212.50	.00	212.50				
5/31/74					212.50	8	EL746Q		04 039443
32006301	064	6067 07629	170.00	.00	170.00			4.1	
			170.00	.00	170.00				
6/25/74					170.00	8	FL245L		04 437700
32006301	064	9170 08452	153.00	.00	153.00			4.1	
			153.00	.00	153.00				
10/10/74					153.00	8	K05732		04 443320
VENDOR TOTAL			650.75	.00	650.75	8			
32010202	700	5050 26543	26.20	.00	26.20			4.2	
			26.20	.00	26.20				

5/20/74

26.20

8

EL1733

04 010269

VENDOR TOTAL

26.20

.00

26.20

32010204 577 6007 06104

25.00

.00

25.00

3.2

25.00

.00

25.00

MORE

ACCOUNTS PAYABLE

MONTHLY CHECK DETAIL REPORT

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VENDOR #	PLT	C-7 INU/REF	GROSS AMOUNT	DISCOUNT	NET AMOUNT	VOUCHER #	L TYPE	BR CHECK	NAME #
DRP	32004102	Q23 2365	120.96	1.21	119.75			41	
			120.96	1.21	119.75				

3/11/74	*			119.75	*	CQ6215		03 261023
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32004102	Q23 5413	Q7585	131.40	1.31	130.09			41
			131.40	1.31	130.09			

UNITED BRANDS

6/12/74	*			130.09	*	FQ7835		03 306448
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32004102	Q23 7125	Q9057	137.16	00	137.16			41
			137.16	00	137.16			

7/31/74	*			137.16	*	G19540		03 972421
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32004102	Q23 8346	Q8554	159.12	1.52	157.53			41
			159.12	1.52	157.53			

UNIVERSAL BLD

9/16/74	*			157.53	*	JQ7333		03 274307
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32004102	Q23 Q268	Q9071	183.12	1.83	181.29			41
			183.12	1.83	181.29			

1974

11/11/74	*			181.29	*	LQ5223		03 277319
----------	---	--	--	--------	---	--------	--	-----------

VENDOR TOTAL			731.76	*	5.94	*	725.82	*	
✓	32006301	Q64 6229	Q6526	123.25	00	123.25		41	
			123.25	00	123.25				

12/13/74	*			123.25	*	AQ6275		04 001684
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**PRIMERICA CORPORATION (AMERICAN CAN COMPANY)
MICROFICHE DATA PERTAINING TO U.S. SCRAP CORPORATION,
LIQUID ENGINEERING CORPORATION DIVISION, FOR
WHICH SUPPORTING RECORDS ARE NO LONGER AVAILABLE (1974)**

INVOICE ENTRY WORKSHEET (Form C-7)		No./Date	Invoice #	Amount
9228		10/7/74	08390	208.25
9155		10/7/74	08521	138.00
10024		10/21/74	08453	153.00
10024		10/21/74	08494	195.50
10237		11/5/74	08566	199.75
11122		11/20/74	N0174	216.75
11054		11/20/74	08664	353.75
12388		1/2/75	10716	272.25
12389		1/2/75	10799	178.50
12599		1/10/75	10926	342.75

K13

1974

ACCOUNTS PAYABLE

12/31/74 MONTHLY CHECK DETAIL REPORT

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DOB	VENDOR #	PLT	C-7 INU/REF	GROSS AMOUNT	DISCOUNT	NET AMOUNT	VOUCHER #	L TYPE	BR CHECK
	31989601	068	4389	10299	.00	178.50			41
	31989601	068	4388	10716	.00	272.25			41
				450.75	.00	450.75			

							450.75	*	A03089
									08 872646

31989601	672	9155	08521	138.00	.00	138.00		42
31989601	068	9228	08390	208.25	.00	208.25		41
				346.25	.00	346.25		

							346.25	*	K03268
									04 442491

31989601	068	0024	08453	153.00	.00	153.00		41
31989601	068	0024	08494	195.50	.00	195.50		41
				348.50	.00	348.50		

							348.50	*	K10570
									04 444270

31989601	068	0237	08566	199.75	.00	199.75		41
				199.75	.00	199.75		

							199.75	*	L02545
									04 018204
31989601	068	-054	08664	353.75	.00	353.75		41	
31989601	068	-122	N0174	216.75	.00	216.75		41	
				570.50	.00	570.50			

							570.50	*	L07505
									04 021687

UNITED S

**PRIMERICA CORPORATION (AMERICAN CAN COMPANY)
MICROFICHE DATA PERTAINING TO U.S. SCRAP CORPORATION,
LIQUID ENGINEERING CORPORATION DIVISION, FOR
WHICH SUPPORTING RECORDS ARE NO LONGER AVAILABLE (1975)**

<u>INVOICE ENTRY WORKSHEET</u> <u>(Form C-7)</u>	<u>No./Date</u>	<u>Invoice #</u>	<u>Amount</u>
1446	2/10/75	11054	284.75
2493	3/3/75	11140	242.25
3558	4/1/75	11253	259.25
7102	7/10/75	11639	276.35
7508	7/31/75	11811	250.75
8063	8/15/75	11902	100.80
8327	8/20/75	11849	229.50
9196	9/15/75	12289	212.50
9177	10/10/75	11976	210.00
10046	10/10/75	11977	255.00
11066	11/17/75	12433	259.25
12230	12/22/75	12547	267.75
4578	4/25/75	11380	373.00
5469	5/27/75	11511	280.50

ACCOUNTS PAYABLE

1/05/76 MONTHLY CHECK DETAIL REPORT PAGE 22700

VENDOR #	PLT	C-7	INV REF	GROSS AMOUNT	DISCOUNT	NET AMOUNT	VOUCHER D L	TYPE BK	CHECK
31989201	034	-243	19818	149.20	.74	148.46		4	1
31989201	034	-128	19563	215.31	1.07	214.24		4	1
				364.51	1.81	362.70			

12/10/75

-VENDOR TOTAL-	6,129.22	*	28.54	*	6,100.68	*	M06893	04	469801
31989502	604	9310	09295	25.40	.00	25.40		0	2
				25.40	.00	25.40			

10/06/75

-VENDOR TOTAL-	25.40	*	.00	*	25.40	*	K02986	01	150840
31989503	939	0007	10005	35.00	.00	35.00		6	8
				35.00	.00	35.00			

1975

-VENDOR TOTAL-	35.00	*	.00	*	35.00	***-TAPE ERROR-**			
31989601	068	8599	10926	342.75	.00	342.75		4	1
				342.75	.00	342.75			

1/10/75

31989601	068	1446	11054	284.75	.00	284.75		4	1
				284.75	.00	284.75			

2/10/75

				284.75	*	B07336	04	451948
--	--	--	--	--------	---	--------	----	--------

NAME 0

QV 7 [REDACTED]

1925

ACCOUNTS PAYABLE

1105-76

MONTHLY CHECK DETAIL REPORT

PAGE 22701

1517

ACCOUNTS PAYABLE

MONTHLY CHECK DETAIL REPORT					PAGE 22702	NAME	
VENDOR #	PLT	C-7 INV/REF	GROSS AMOUNT	DISCOUNT	NET AMOUNT		VOUCHER # L TYPE BK CHECK
31989601	068	9196 12289	212.50	.00	212.50	4 1	
			212.50	.00	212.50		
9/15/75 8							
31989601	672	9177 11976	210.00	.00	210.00	4 2	
31989601	068	0046 11997	299.00	.00	299.00	4 1	
			465.00	.00	465.00		
10/10/75 8							
31989601	068	-066 12433	259.25	.00	259.25	4 1	
			259.25	.00	259.25		
11/17/75 8							
31989601	068	8230 12547	267.75	.00	267.75	4 1	
			267.75	.00	267.75		
12/22/75 8							
-VENDOR TOTAL-			3,190.80	.00	3,190.80		
31989901	090	2029 52537	156.05	1.48	154.57	4 1	
			156.05	1.48	154.57		

ACCOUNTS PAYABLE

MONTHLY CHECK DETAIL REPORT

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VENDOR # PLI C-L INV/REF GROSS AMOUNT DISCOUNT NET AMOUNT VOUCHER D L TYPE BK CHECK

NAME

809.79 4.03 805.76

5/12/75 * 805.76 E07874 04 030757

31989201	034	5220	43559	162.10	.81	161.29	41
				162.10	.81	161.29	

5/15/75 * 161.29 E06806 08 880539

31989201	034	5249	53631	149.43	.74	148.69	41
31989201	034	5494	54137	180.00	.90	179.10	41
31989201	034	5493	54136	232.11	1.15	230.96	41
31989201	034	6053	54341	278.72	1.39	277.33	41
31989201	034	6052	54342	101.85	.50	101.35	41
				942.11	4.68	937.43	

6/10/75 * 937.43 E07123 04 458550

VENDOR TOTAL		2,491.53 *	12.39 *	2,479.14 *			
31989601	068	4578	11380	373.00	.00	373.00	41
				373.00	.00	373.00	

4/25/75 * 373.00 E015421 04 457220

31989601	068	5469	11511	280.50	.00	280.50	41
				280.50	.00	280.50	

5/27/75 * 280.50 EET1314 04 032341

VENDOR TOTAL		653.50 *	.00 *	653.50 *	
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PRIMERICA CORPORATION (AMERICAN CAN COMPANY)
MICROFICHE DATA PERTAINING TO U.S. SCRAP CORPORATION,
LIQUID ENGINEERING CORPORATION DIVISION, FOR
WHICH SUPPORTING RECORDS ARE NO LONGER AVAILABLE (1976)

<u>INVOICE ENTRY WORKSHEET</u> <u>(Form C-7)</u>	<u>No./Date</u>	<u>Invoice #</u>	<u>Amount</u>
1042	1/15/76	12644	238.00
1158	2/5/76	09536	144.00
2081	2/10/76	95548	293.25
3046	3/10/76	8777	340.00
3565	4/5/76	8790	293.25

ACCOUNTS PAYABLE

1/04/77 MONTHLY CHECK DETAIL REPORT

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ORP	VEENDOR # PLT C-7 INV/REF #	GROSS AMOUNT	DISCOUNT	NET AMOUNT	VOUCHER # L TYPE BR CHECK
	-VENDOR TOTAL-	\$ 0.00 8	.00 8	\$ 0.00 8	
	31989504 604 0189 1018600000	20.00	.00	20.00	0 2
	1/01/76 8			20.00 8	L03623 01 104120
	-VENDOR TOTAL-	20.00 8	.00 8	20.00 8	
	31989601 068 1042 1266400000	238.00	.00	238.00	4 1
	1/15/76 8			238.00 8	A07218 04 065772
	31989601 672 1158 0953600000	144.00	.00	144.00	4 2
	2/05/76 8			144.00 8	B04876 08 818223
	31989601 068 2081 9554800000	293.25	.00	293.25	4 1
	2/10/76 8			293.25 8	B06977 04 413070
	31989601 068 3046 8777 000000	340.00	.00	340.00	4 1
	3/10/76 8			340.00 8	C07194 04 067310
	31989601 068 3565 8790 000000	293.25	.00	293.25	4 1
	4/05/76 8			293.25 8	D02586 08 821323
	-VENDOR TOTAL-	1,308.50 8	.00 8	1,308.50 8	
ORP	31989801 511 3332 297 00000	15,030.06	150.30	14,879.76	3 1
	31989801 604 3675 286 00000	5,116.62	51.17	5,065.45	0 8
	3/31/76 8			19,945.21 8	C16897 01 167468
	31989801 503 3706 304 00000	3,755.33	37.55	3,717.78	3 1
	31989801 068 3564 340 00000	805.00	7.75	797.25	4 1
	31989801 511 4017 339 00000	1,600.00	16.00	1,584.00	3 1
	31989801 511 4016 338 00000	10,596.14	105.96	10,490.18	3 1
	4/05/76 8			16,589.21 8	D02587 08 821324
	31989801 082 4029 341 00000	483.00	4.83	478.17	4 1
	31989801 064 3259 353 00000	3,349.55	33.50	3,316.05	4 1
	4/12/76 8			3,794.22 8	D05409 04 416846
	31989801 068 4216 408 00000	1,288.00	12.40	1,275.60	4 1
	4/20/76 8			1,275.60 8	D07981 08 822003
	31989801 511 4239 417 00000	11,883.05	118.83	11,764.22	3 1
	31989801 036 4094 389 00000	3,220.00	31.00	3,189.00	4 1
	31989801 080 4054 418 00000	3,220.00	32.20	3,187.80	4 1

**PRIMERICA CORPORATION (AMERICAN CAN COMPANY)
MICROFICHE DATA PERTAINING TO U.S. DRUM
DISPOSAL CORPORATION, FOR WHICH SUPPORTING
RECORDS ARE NO LONGER AVAILABLE (1976)**

<u>INVOICE ENTRY WORKSHEET</u> <u>(Form C-7)</u>	<u>No./Date</u>	<u>Invoice #</u>	<u>Amount</u>
5038	5/10/76	4208	340.00
5187	6/7/76	4219	144.00
6044	6/10/76	4239	331.50
7163	7/26/76	4282	340.00
9024	9/10/76	4320	331.50
9337	9/27/76	4356	340.00
10305	10/25/76	4385	340.00
11484	12/6/76	4424	323.00
12503	12/31/76	4457	340.00

6

			4.318.67	.00	4.318.67	3	
197		7/06/76 8			4.318.67 8	602629	02 258542
	31982301 108 9043 5235000000	2,909.70	.00	2,909.70		4 1	
	31982301 108 9043 5249000000	5,538.50	.00	5,538.50		4 1	
	9/10/76 8			8,448.20 8	J05217	02 263913	
	31982301 511 0213 6591000000	3,700.00	.00	3,700.00		3 1	
	31982301 507 0271 0927760000	470.00	.00	470.00		3 1 CM	
	10/25/76 8			3,230.00 8	K11931	02 266965	
	-VENDOR TOTAL -	32,419.44 8	.00 8	32,419.44 8			
	31982401 605 0398 1027600000	5.20	.00	5.20		0 2	
	-VENDOR TOTAL -	5.20 8	.00 8	5.20 8			
IP	31982601 356 1087 0484000000	508.80	.00	508.80		4 1	
	12/12/76 8			508.80 8	A05256	05 548044	
	31982601 356 1022 0490500000	305.28	.00	305.28		4 1	
	2/02/76 8			305.28 8	B03137	05 548639	
	-VENDOR TOTAL -	814.08 8	.00 8	814.08 8			
SAL CORP	31982701 068 5038 4208	340.00	.00	340.00		4 1	
	5/10/76 8			340.00 8	E04559	04 071601	
	31982701 672 5187 4219000000	144.00	.00	144.00		4 2	
	6/07/76 8			144.00 8	F05538	08 823895	
	31982701 068 6044 4239	331.50	.00	331.50		4 1	
	6/10/76 8			331.50 8	F07409	04 421046	
	31982701 068 7163 4282000000	340.00	.00	340.00		4 1	
	7/26/76 8			340.00 8	G11675	04 078825	
	31982701 068 9024 4320000000	331.50	.00	331.50		4 1	
	9/10/76 8			331.50 8	J05218	04 078578	
	31982701 068 9337 4356000000	340.00	.00	340.00		4 1	
	9/27/76 8			340.00 8	J12064	04 080340	
	31982701 068 0305 4385000000	340.00	.00	340.00		4 1	
	10/25/76 8			340.00 8	K11932	04 429769	
	31982701 068 484 4424000000	323.00	.00	323.00		4 1	
	12/06/76 8			323.00 8	M03028	08 833876	

31982701 068 484 4424000000 323.00 00 323.00 41
 12/06/76 8 323.00 8 M03028 08 033876

1976

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ACCOUNTS PAYABLE

1/04/77 MONTHLY CHECK DETAIL REPORT PAGE 13304

VDOR	VEENDOR # PLT C-7 INU/REF #	GROSS AMOUNT	DISCOUNT	NET AMOUNT	VOUCHER D L TYPE BK CHECK
	31982701 068 6503 4457000000	340.00	.00	340.00	41
	12/31/76 8			340.00 8	M15068 04 433419
	-VEENDOR TOTAL -	2,830.00 8	.00 8	2,830.00 8	
IANCE CO	31982901 060 6088 1003200000	357.00	.00	357.00	41
	6/30/76 8			357.00 8	F16374 03 317162
	31982901 022 8064 1575600000	174.30	3.32	170.98	02 J02968 03 978474
	9/07/76 8			170.98 8	J02968 03 978474
	-VEENDOR TOTAL -	531.30 8	3.32 8	527.98 8	
RP	31983301 351 2111 6094900000	108.57	.00	108.57	41
	3/22/76 8			108.57 8	C12173 03 969833
	-VEENDOR TOTAL -	108.57 8	.00 8	108.57 8	
CO	31983503 672 6097 3647700000	411.92	7.05	404.07	42
	12/20/76 8			404.07 8	M10413 08 834795
	-VEENDOR TOTAL -	411.92 8	7.05 8	404.07 8	
TER	31983701 600 7943 8303060ZBY	10.50	.00	10.50	02
	8/05/76 8			10.50 8	H02682 01 176834
	-VEENDOR TOTAL -	10.50 8	.00 8	10.50 8	
	31983801 604 5122 0525600000	780.00	.00	780.00	08
4	31983801 552 5347 369037	12,282.00	.00	12,282.00	41
	6/01/76 8			13,062.00 8	F03277 01 171851
	31983801 552 5557 369771	480.60	.00	480.60	41
	31983801 552 5414 369772	7,979.40	.00	7,979.40	41

PRIMERICA CORPORATION (AMERICAN CAN COMPANY)
MICROFICHE DATA PERTAINING TO U.S. DRUM
DISPOSAL CORPORATION, FOR WHICH SUPPORTING
RECORDS ARE NO LONGER AVAILABLE (1977)

<u>INVOICE ENTRY WORKSHEET</u> <u>(Form C-7)</u>	<u>No./Date</u>	<u>Invoice #</u>	<u>Amount</u>
3621	4/5/77	4499	340.00
8300	9/12/77	4638	192.00
9215	9/30/77	4660	168.00

8/10/77 *				111.85 *	H05535	03 333865
31982301 034 7336 8671000000	267.28	.00		267.28	4 1	
8/15/77 *				267.28 *	H07702	03 334586
31982301 503 8332 9194000000	904.67	.00		904.67	3 1	
8/31/77 *				904.67 *	H14810	03 336443
31982301 034 9391 3417000000	820.00	.00		820.00	4 1	
31982301 034 9391 5249A00000	5,225.00	.00		5,225.00	4 1	
9/26/77 *				6,045.00 *	J11910	02 292660
31982301 034 -037 1235700000	292.53	.00		292.53	4 1	
<i>1977</i>	11/15/77 *			292.53 *	L07298	03 913306
-VENDOR TOTAL-	14,042.86 *	.00 *		14,042.86 *		
31982701 068 3621 4499000000	340.00	.00		340.00	4 1	
4/05/77 *				340.00 *	002538	08 840648

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ACCO UNTS PAYABLE

4/78	MONTHLY CHECK DETAIL REPORT	PAGE 13837				
VENDOR #	PLT C-7 INU/REF #	GROSS AMOUNT	DISCOUNT	NET AMOUNT	VOUCHER D L TYPE BK CHECK	NAME OF
31982701 672 8300 4638000000		192.00	.00	192.00	4 2	
9/12/77 *						
31982701 672 9215 4660000000		168.00	.00	168.00	4 2	04 011960
9/30/77 *				168.00 *	J14444	08 850042
-VENDOR TOTAL-		700.00 *	.00 *	700.00 *		
31983401 721 8403 4187800000		15.98	.00	15.98	3 2	
1/10/77 *						
31983401 721 8665 4203700000		595.00	.00	595.00	3 2	05 560971
31983401 721 8665 4203700000		361.40	.00	361.40	3 2	
1/17/77 *						
31983401 721 -673 5233900000		43.20	.00	43.20	3 2	05 562016
12/12/77 *						
31983401 721 8298 5404600000		282.54	.00	282.54	3 2	05 574186
12/23/77 *						
-VENDOR TOTAL-		1,298.12 *	.00 *	1,298.12 *		

**PRIMERICA CORPORATION (AMERICAN CAN COMPANY)
MICROFICHE DATA PERTAINING TO U.S. DRUM
DISPOSAL CORPORATION, FOR WHICH SUPPORTING
RECORDS ARE NO LONGER AVAILABLE (1978)**

<u>INVOICE ENTRY WORKSHEET</u> <u>(Form C-7)</u>	<u>No./Date</u>	<u>Invoice #</u>	<u>Amount</u>
4244	5/5/78	5031	126.00
7304	7/31/78	5244	480.00
8230	8/31/78	5221	50.00
8230	8/31/78	5272	336.00

NDOR	VENDOR #	PLT	C-7 INV/REF #	GROSS AMOUNT	DISCOUNT	NET AMOUNT	VOUCHER #	L TYPE	BK CHECK
			-VENDOR TOTAL-	52,458.12	.00	52,458.12			
RCE-NORR	31982401 604 1245	0123	0000000	5.00	.00	5.00		0 2	
<i>[98]</i>			1/31/78 *			5.00 *	A14380	DL 134484	
			-VENDOR TOTAL-	5.00	.00	5.00			
	31982501 715 -006	1030	0000000	3,400.70	.00	3,400.70		4 4	
			1/31/78 *			3,400.70 *	10309L	DL 155727	
			-VENDOR TOTAL-	3,400.70	.00	3,400.70			
CORP	31982701 672 4244	5031	0000000	126.00	.00	126.00		4 2	
	31982701 068 7304	5244	0000000	480.00	.00	480.00	E03452	4 1	04 025439
	31982701 672 8230	5221	0000000	50.00	.00	50.00	G14473	4 2	08 802510
	31982701 672 8230	5272	0000000	336.00	.00	336.00		4 2	
			8/31/78 *			386.00 *	H15207		08 805282
	-VENDOR TOTAL-	...		992.00	*	992.00	*		
	31982801 655 -003	8647	700000	4.88	.00	4.88		0 2	
	31982801 655 -003	8647	700000	4.88	.00	4.88		0 2	
	31982801 655 -003	8647	700000	4.88	.00	4.88		0 2	
	31982801 655 -003	8647	700000	29.28	.00	29.28		0 2	
	31982801 655 -003	8647	700000	29.28	.00	29.28		0 2	
	31982801 655 -003	8647	700000	9.80	.00	9.80		0 2	
	31982801 655 -003	8647	700000	39.04	.00	39.04		0 2	
			11/27/78 *			122.04 *	L10280		04 036217
	-VENDOR TOTAL-	...		122.04	*	122.04	*		
DTORS	31983001 064 & 111	6524	373000	933.60	.00	933.60		4 1	
			12/26/78 *			933.60 *	H12262		08 814529
	-VENDOR TOTAL-	...		933.60	*	933.60	*		
CORP	31983401 721 -194	6463	800000	171.00	.00	171.00		3 2	
			11/20/78 *			171.00 *	L07719		05 587422
	-VENDOR TOTAL-	...		171.00	*	171.00	*		
	31983801 500 1218	4127	260000	107.93	.00	107.93		4 1	
			2/06/78 *			107.93 *	B02076		03 344529

Exhibit B

SUMMARY FINANCIAL INFORMATION
(Dollars in thousands)

SUMMARY FINANCIAL INFORMATION — (Continued)
(Dollars in thousands)

	Predecessor Corporation			The Company			
	December 31,			December 31,		March 31, 1957	
	1982	1983	1964	1985	1966	Actual	Adjusted (j) (Unaudited)
Balance Sheet Data:							
Working Capital	\$ 127,173	\$ 62,259	\$ 76,729	\$ 325,095	\$ 126,107	\$ 102,107	\$ 234,667
Total assets	785,016	680,819	864,122	1,229,544	1,364,219	1,394,970	2,742,074
Short-term debt	35,593	61,922	69,001	117,094	126,905	231,966	372,506
Long-term debt excluding current portion	131,433	124,707	111,245	605,912	367,873	354,628	651,499
Shareholder's equity	335,418	339,493	370,667	151,033	345,963	342,484	464,415



QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
NUMBER

7288103686

65

F

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6033N

7288103686

Date
5/17/88

From (Your Name) Please Print

Timothy G. Rogers, Esq.

Company

CADWALADER WICKERSHAM & TAFT

Street Address

100 MAIDEN LANE

City

NEW YORK

State

NY

ZIP Required For Correct Invoicing

10038

YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)

3>

 PAYMENT Bill Sender Bill Recipient's FedEx Acct. No. Bill 3rd Party FedEx Acct. No. Bill Credit Card Cash4> SERVICES
CHECK ONLY ONE BOX

PRIORITY 1
Overnight Delivery Using Your Packaging

OVERNIGHT LETTER*
(Our Packaging)
9½" x 12½"

OVERNIGHT DELIVERY USING OUR PACKAGING

Courier Pak Overnight Envelope*
12" x 15"

Overnight Box
12½" x 17½" x 3"

A

Overnight Tube
38" x 6" x 6"

B

*Declared Value Limit \$100.

STANDARD AIR
Delivery not later than second business day

SERVICE COMMITMENT

PRIORITY 1 - Delivery is scheduled early next business morning in most locations. It may take two or more business days if the destination is outside our primary service area.

STANDARD AIR - Delivery is normally next business day or not later than second business day. It may take three or more business days if the destination is outside our primary service area.

Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.

Release

Signature:

DELIVERY AND SPECIAL HANDLING
CHECK SERVICES REQUIRED HOLD FOR PICK-UP

(Fill in Section H at right)

 DELIVER WEEKDAY DELIVER SATURDAY (Extra charge) DANGEROUS GOODS

(P-1 and Standard Air Packages only. Extra charge)

 CONSTANT SURVEILLANCE SERVICE (CSS)

(Extra charge) (Do Not Complete Section S)

 DRY ICE _____ lbs. OTHER SPECIAL SERVICE _____ SATURDAY PICK-UP

(Extra charge)

PACKAGES

WEIGHT

YOUR DECLARED
VALUEOVER
SIZE

LBS

LBS